

DRAFT/PROPOSED CAAPP PERMIT
October 8, 2014

Attention:

Clear Lam Packaging, Inc.
Attn: Thomas Wedoff
1950 Pratt Boulevard
Elk Grove Village, Illinois 60007

State of Illinois

CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

Source:

Clear Lam Packaging, Inc.
1950 Pratt Boulevard
Elk Grove Village, Illinois 60007

I.D. No.: 031440AHX
Permit No.: 95090246

Permitting Authority:

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
217/785-1705

CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

Type of Application: Renewal
Purpose of Application: Renew Existing CAAPP Permit for 5 Years

ID No.: 031440AHX
Permit No.: 95090246
Statement of Basis No.: 95090246

Date Application Received: November 16, 2009
Date Issued: TBD

Expiration Date: TBD
Renewal Submittal Date: 9 Months Prior to TBD

Source Name: Clear Lam Packaging, Inc.
Address: 1950 Pratt Boulevard
City: Elk Grove Village
County: Cook
ZIP Code: 60007

This permit is hereby granted to the above-designated source authorizing operation in accordance with this CAAPP permit, pursuant to the above referenced application. This source is subject to the conditions contained herein. For further information on the source see Section 1 and for further discussion on the effectiveness of this permit see Condition 2.3(g).

If you have any questions concerning this permit, please contact David Hulskotter at 217/785-1705.

Raymond E. Pilapil
Acting Manager, Permit Section
Division of Air Pollution Control

REP:MTR:DWH:psj

cc: IEPA, Permit Section
IEPA, FOS, Region 1
Lotus Notes Database

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Section 1 - Source Information

1. Addresses

Source

Clear Lam Packaging, Inc.
1950 Pratt Boulevard
Elk Grove Village, Illinois 60007

Owner

Clear Lam Packaging, Inc.
1950 Pratt Boulevard
Elk Grove Village, Illinois 60007

Operator

Clear Lam Packaging, Inc.
1950 Pratt Boulevard
Elk Grove Village, Illinois 60007

Permittee

The Owner or Operator of the source as
identified in this table.

2. Contacts

Certified Officials

The source shall submit an Administrative Permit Amendment for any change in the Certified Officials, pursuant to Section 39.5(13) of the Act.

	<i>Name</i>	<i>Title</i>
<i>Responsible Official</i>	Thomas Wedoff	Vice President, Finance
<i>Delegated Authority</i>	No other individuals have been authorized by the IEPA.	N/A

Other Contacts

	<i>Name</i>	<i>Phone No.</i>	<i>Email</i>
<i>Source Contact</i>	Thomas Wedoff	847-439-8570	N/A
<i>Technical Contact</i>	William O'Shea	630-243-8364	N/A
<i>Correspondence</i>	Thomas Wedoff	847-439-8570	N/A
<i>Billing</i>	Thomas Wedoff	847-439-8570	N/A

3. Single Source

The source identified in Condition 1.1 above shall be defined to include all the following additional source(s):

<i>I.D. No.</i>	<i>Permit No.</i>	<i>Single Source Name and Address</i>
N/A	N/A	N/A

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Section 2 - General Permit Requirements

1. Prohibitions

- a. It shall be unlawful for any person to violate any terms or conditions of this permit issued under Section 39.5 of the Act, to operate the CAAPP source except in compliance with this permit issued by the IEPA under Section 39.5 of the Act or to violate any other applicable requirements. All terms and conditions of this permit issued under Section 39.5 of the Act are enforceable by USEPA and citizens under the Clean Air Act, except those, if any, that are specifically designated as not being federally enforceable in this permit pursuant to Section 39.5(7)(m) of the Act. [Section 39.5(6)(a) of the Act]
- b. After the applicable CAAPP permit or renewal application submittal date, as specified in Section 39.5(5) of the Act, the source shall not operate this CAAPP source without a CAAPP permit unless the complete CAAPP permit or renewal application for such source has been timely submitted to the IEPA. [Section 39.5(6)(b) of the Act]
- c. No Owner or Operator of the CAAPP source shall cause or threaten or allow the continued operation of an emission source during malfunction or breakdown of the emission source or related air pollution control equipment if such operation would cause a violation of the standards or limitations applicable to the source, unless this CAAPP permit granted to the source provides for such operation consistent with the Act and applicable Illinois Pollution Control Board regulations. [Section 39.5(6)(c) of the Act]
- d. Pursuant to Section 39.5(7)(g) of the Act, emissions from the source are not allowed to exceed any allowances that the source lawfully holds under Title IV of the Clean Air Act or the regulations promulgated thereunder, consistent with Section 39.5(17) of the Act and applicable requirements, if any.

2. Emergency Provisions

Pursuant to Section 39.5(7)(k) of the Act, the Owner or Operator of the CAAPP source may provide an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations under this CAAPP permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:

- a.
 - i. An emergency occurred and the source can identify the cause(s) of the emergency.
 - ii. The source was at the time being properly operated.
 - iii. The source submitted notice of the emergency to the IEPA within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
 - iv. During the period of the emergency the source took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or requirements in this permit.
- b. For purposes of Section 39.5(7)(k) of the Act, "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, such as an act of God, that requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operation error.
- c. In any enforcement proceeding, the source seeking to establish the occurrence of an emergency has the burden of proof. This provision is in addition to any emergency or

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upset provision contained in any applicable requirement. This provision does not relieve the source of any reporting obligations under existing federal or state laws or regulations.

3. General Provisions

a. Duty to Comply

The source must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. [Section 39.5(7)(o)(i) of the Act]

b. Need to Halt or Reduce Activity is not a Defense

It shall not be a defense for the source in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [Section 39.5(7)(o)(ii) of the Act]

c. Duty to Maintain Equipment

The source shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements. [Section 39.5(7)(a) of the Act]

d. Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated there under. [Section 39.5(7)(a) of the Act]

e. Duty to Pay Fees

- i. The source must pay fees to the IEPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto. [Section 39.5(7)(o)(vi) of the Act]
- ii. The IEPA shall assess annual fees based on the allowable emissions of all regulated air pollutants, except for those regulated air pollutants excluded in Section 39.5(18)(f) of the Act and insignificant activities in Section 6, at the source during the term of this permit. The amount of such fee shall be based on the information supplied by the applicant in its complete CAAPP permit application. [Section 39.5(18)(a)(ii)(A) of the Act]
- iii. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois EPA, P.O. Box 19276, Springfield, IL, 62794-9276. Include on the check: ID #, Permit #, and "CAAPP Operating Permit Fees". [Section 39.5(18)(e) of the Act]

f. Obligation to Allow IEPA Surveillance

Pursuant to Sections 4(a), 39.5(7)(a), and 39.5(7)(p)(ii) of the Act, inspection and entry requirements that necessitate that, upon presentation of credentials and other documents as may be required by law and in accordance with constitutional limitations, the source shall allow the IEPA, or an authorized representative to perform the following:

- i. Enter upon the source's premises where the emission unit(s) are located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

- ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit.
- iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
- iv. Sample or monitor any substances or parameters at any location at reasonable times:
 - A. As authorized by the Clean Air Act or the Act, at reasonable times, for the purposes of assuring compliance with this CAAPP permit or applicable requirements; or
 - B. As otherwise authorized by the Act.
- v. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

g. Effect of Permit

- i. Pursuant to Section 39.5(7)(j)(iv) of the Act, nothing in this CAAPP permit shall alter or affect the following:
 - A. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section.
 - B. The liability of the Owner or Operator of the source for any violation of applicable requirements prior to or at the time of permit issuance.
 - C. The applicable requirements of the acid rain program consistent with Section 408(a) of the Clean Air Act.
 - D. The ability of USEPA to obtain information from the source pursuant to Section 114 (inspections, monitoring, and entry) of the Clean Air Act.
- ii. Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, pursuant to Sections 39.5(7)(j) and (p) of the Act, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements. [35 IAC 201.122 and Section 39.5(7)(a) of the Act]

h. Severability Clause

The provisions of this permit are severable. In the event of a challenge to any portion of this permit, other portions of this permit may continue to be in effect. Should any portion of this permit be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected and the rights and obligations of the source shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force. [Section 39.5(7)(i) of the Act]

4. <u>Testing</u>

- a. Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods if applicable test methods are not specified by the applicable regulations or otherwise identified in the conditions of this permit. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of

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any tests conducted as required by this permit or as the result of a request by the IEPA shall be submitted as specified in Condition 7.1 of this permit. [35 IAC Part 201 Subpart J and Section 39.5(7)(a) of the Act]

- b. Pursuant to Section 4(b) of the Act and 35 IAC 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
 - i. **Testing by Owner or Operator:** The IEPA may require the Owner or Operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the IEPA, at such reasonable times as may be specified by the IEPA and at the expense of the Owner or Operator of the emission source or air pollution control equipment. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The IEPA shall have the right to observe all aspects of such tests.
 - ii. **Testing by the IEPA:** The IEPA shall have the right to conduct such tests at any time at its own expense. Upon request of the IEPA, the Owner or Operator of the emission source or air pollution control equipment shall provide, without charge to the IEPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.

5. Recordkeeping

a. Control Equipment Maintenance Records

Pursuant to Section 39.5(7)(b) of the Act, a maintenance record shall be kept on the premises for each item of air pollution control equipment. At a minimum, this record shall show the dates maintenance was performed and the nature of preventative maintenance activities.

b. Retention of Records

- i. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [Section 39.5(7)(e)(ii) of the Act]
- ii. Pursuant to Section 39.5(7)(a) of the Act, other records required by this permit including any logs, plans, procedures, or instructions required to be kept by this permit shall be retained for a period of at least 5 years from the date of entry unless a different period is specified by a particular permit provision.

c. Availability of Records

- i. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall retrieve and provide paper copies, or as electronic media, any records retained in an electronic format (e.g., computer) in response to an IEPA or USEPA request during the course of a source inspection.
- ii. Pursuant to Section 39.5(7)(a) of the Act, upon written request by the IEPA for copies of records or reports required to be kept by this permit, the Permittee shall promptly submit a copy of such material to the IEPA. For this purpose, material shall be submitted to the IEPA within 30 days unless additional time is provided by the IEPA or the Permittee believes that the volume and nature of

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requested material would make this overly burdensome, in which case, the Permittee shall respond within 30 days with the explanation and a schedule for submittal of the requested material. (See also Condition 2.9(d))

6. Certification

a. Compliance Certification

- i. Pursuant to Section 39.5(7)(p)(v)(C) of the Act, the source shall submit annual compliance certifications by May 1 unless a different date is specified by an applicable requirement or by a particular permit condition. The annual compliance certifications shall include the following:
 - A. The identification of each term or condition of this permit that is the basis of the certification.
 - B. The compliance status.
 - C. Whether compliance was continuous or intermittent.
 - D. The method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.
- ii. Pursuant to Section 39.5(7)(p)(v)(D) of the Act, all compliance certifications shall be submitted to the IEPA Compliance Section. Addresses are included in Attachment 3.
- iii. Pursuant to Section 39.5(7)(p)(i) of the Act, all compliance reports required to be submitted shall include a certification in accordance with Condition 2.6(b).

b. Certification by a Responsible Official

Any document (including reports) required to be submitted by this permit shall contain a certification by the responsible official of the source that meets the requirements of Section 39.5(5) of the Act and applicable regulations. [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included in Attachment 4 of this permit.

7. Permit Shield

- a. Pursuant to Section 39.5(7)(j) of the Act, except as provided in Condition 2.7(b) below, the source has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the IEPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit. This permit shield does not extend to applicable requirements which are promulgated after September 6, 2013 (date USEPA notice started), unless this permit has been modified to reflect such new requirements.
- b. Pursuant to Section 39.5(7)(j) of the Act, this permit and the terms and conditions herein do not affect the Permittee's past and/or continuing obligation with respect to statutory or regulatory requirements governing major source construction or modification under Title I of the CAA. Further, neither the issuance of this permit nor any of the terms or conditions of the permit shall alter or affect the liability of the Permittee for any violation of applicable requirements prior to or at the time of permit issuance.

- c. Pursuant to Section 39.5(7)(a) of the Act, the issuance of this permit by the IEPA does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any currently pending or future legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the IEPA or the USEPA may have against the applicant including, but not limited to, any enforcement action authorized pursuant to the provision of applicable federal and state law.

8. Title I Conditions

Pursuant to Sections 39(a), 39(f), and 39.5(7)(a) of the Act, as generally identified below, this CAAPP permit may contain certain conditions that relate to requirements arising from the construction or modification of emission units at this source. These requirements derive from permitting programs authorized under Title I of the Clean Air Act (CAA) and regulations thereunder, and Title X of the Illinois Environmental Protection Act (Act) and regulations implementing the same. Such requirements, including the New Source Review programs for both major (i.e., PSD and nonattainment areas) and minor sources, are implemented by the IEPA.

- a. This permit may contain conditions that reflect requirements originally established in construction permits previously issued for this source. These conditions include requirements from preconstruction permits issued pursuant to regulations approved or promulgated by USEPA under Title I of the CAA, as well as requirements contained within construction permits issued pursuant to state law authority under Title X of the Act. Accordingly, all such conditions are incorporated into this CAAPP permit by virtue of being either an "applicable Clean Air Act requirement" or an "applicable requirement" in accordance with Section 39.5 of the Act. These conditions are identifiable herein by a designation to their origin of authority.
- b. This permit may contain conditions that reflect necessary revisions to requirements established for this source in preconstruction permits previously issued under the authority of Title I of the CAA. These conditions are specifically designated herein as "TIR."
 - i. Revisions to original Title I permit conditions are incorporated into this permit through the combined legal authority of Title I of the CAA and Title X of the Act. Public participation requirements and appeal rights shall be governed by Section 39.5 of the Act.
 - ii. Revised Title I permit conditions shall remain in effect through this CAAPP permit, and are therefore enforceable under the same, so long as such conditions do not expire as a result of a failure to timely submit a complete renewal application or are not removed at the applicant's request.
- c. This permit may contain conditions that reflect new requirements for this source that would ordinarily derive from a preconstruction permit established under the authority of Title I of the CAA. These conditions are specifically designated herein as "TIN."
 - i. The incorporation of new Title I requirements into this CAAPP permit is authorized through the combined legal authority of Title I of the CAA and Title X of the Act. Public participation requirements and appeal rights shall be governed by Section 39.5 of the Act.
 - ii. Any Title I conditions that are newly incorporated shall remain in effect through this CAAPP permit, and are therefore enforceable under the same, so long as such conditions do not expire as a result of a failure to timely submit a complete renewal application or are not removed at the applicant's request.

9. Reopening and Revising Permit

a. Permit Actions

This permit may be modified, revoked, reopened and reissued, or terminated for cause in accordance with applicable provisions of Section 39.5 of the Act. The filing of a request by the source for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [Section 39.5(7)(o)(iii) of the Act]

b. Reopening and Revision

Pursuant to Section 39.5(15)(a) of the Act, this permit must be reopened and revised if any of the following occur:

- i. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- ii. Additional requirements become applicable to the source for acid deposition under the acid rain program;
- iii. The IEPA or USEPA determines that this permit contains a material mistake or that an inaccurate statement was made in establishing the emission standards or limitations, or other terms or conditions of this permit; or
- iv. The IEPA or USEPA determines that this permit must be revised or revoked to ensure compliance with the applicable requirements.

c. Inaccurate Application

Pursuant to Sections 39.5(5)(e) and (i) of the Act, the IEPA has issued this permit based upon the information submitted by the source in the permit application referenced on page 1 of this permit. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation or reopening of this CAAPP under Section 39.5(15) of the Act.

d. Duty to Provide Information

The source shall furnish to the IEPA, within a reasonable time specified by the IEPA any information that the IEPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the source shall also furnish to the IEPA copies of records required to be kept by this permit. [Section 39.5(7)(o)(v) of the Act]

10. Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement. [Section 39.5(7)(o)(vii) of the Act]

11. Permit Renewal

- a. Upon the expiration of this permit, if the source is operated, it shall be deemed to be operating without a permit unless a timely and complete CAAPP application has been submitted for renewal of this permit. However, if a timely and complete application to renew this CAAPP permit has been submitted, the terms and all conditions of the most recent issued CAAPP permit will remain in effect until the issuance of a renewal permit. [Sections 39.5(5)(1) and (o) of the Act]

- b. For purposes of permit renewal, a timely application is one that is submitted no less than 9 months prior to the date of permit expiration. [Section 39.5(5)(n) of the Act]

12. Permanent Shutdown

Pursuant to Section 39.5(7)(a) of the Act, this permit only covers emission units and control equipment while physically present at the source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

13. Startup, Shutdown, and Malfunction

Pursuant to Section 39.5(7)(a) of the Act, in the event of an action to enforce the terms or conditions of this permit, this permit does not prohibit a Permittee from invoking any affirmative defense that is provided by the applicable law or rule.

Section 3 - Source Requirements

1. Applicable Requirements

Pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act, the Permittee shall comply with the following applicable requirements. These requirements are applicable to all emission units (including insignificant activities unless specified otherwise in this Section) at the source.

a. Fugitive Particulate Matter

- i. Pursuant to 35 IAC 212.301 and 35 IAC 212.314, no person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source unless the wind speed is greater than 25 mph.
- ii. Compliance Method (Fugitive Particulate Matter)

Upon request by the IEPA, the Permittee shall conduct observations at the property line of the source for visible emissions of fugitive particulate matter from the source to address compliance with 35 IAC 212.301. For this purpose, daily observations shall be conducted for a week for particular area(s) of concern at the source, as specified in the request, observations shall begin either within one day or three days of receipt of a written request from the IEPA, depending, respectively, upon whether observations will be conducted by employees of the Permittee or a third-party observer hired by the Permittee to conduct observations on its behalf. The Permittee shall keep records for these observations, including identity of the observer, the date and time of observations, the location(s) from which observations were made, and duration of any fugitive emissions event(s).

b. Emissions Reduction Market System (ERMS)

Pursuant to 35 IAC Part 205, this source is considered a "participating source" for purposes of the ERMS. The allotment of ATUs to this source is 557 ATUs per seasonal allotment period. The Permittee shall comply with all applicable requirements in Section 7.3.

c. Ozone Depleting Substances

Pursuant to 40 CFR 82.150(b), the Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- i. Pursuant to 40 CFR 82.156, persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices.
- ii. Pursuant to 40 CFR 82.158, equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment.
- iii. Pursuant to 40 CFR 82.161, persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program.
- iv. Pursuant to 40 CFR 82 Subpart B, any person performing service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner shall comply with 40 CFR 82 Subpart B, Servicing of Motor Vehicle Air Conditioners.

- v. Pursuant to 40 CFR 82.166, all persons shall comply with the reporting and recordkeeping requirements of 40 CFR 82.166.

d. Asbestos Demolition and Renovation

- i. Asbestos Fees. Pursuant to Section 9.13(a) of the Act, for any site for which the Owner or Operator must file an original 10-day notice of intent to renovate or demolish pursuant to Condition 3.1(d)(ii) below and 40 CFR 61.145(b), the owner or operator shall pay to the IEPA with the filing of each 10-day notice a fee of \$150.
- ii. Pursuant to 40 CFR 61 Subpart M, Standard of Asbestos, prior to any demolition or renovation at this facility, the Permittee shall fulfill notification requirements of 40 CFR 61.145(b).
- iii. Pursuant to 40 CFR 61.145(c), during demolition or renovation, the Permittee shall comply with the procedures for asbestos emission control established by 40 CFR 61.145(c).

e. Future Emission Standards

Pursuant to Section 39.5(15)(a) of the Act, this source shall comply with any new or revised applicable future standards of 40 CFR 60, 61, 62, or 63; or 35 IAC Subtitle B after the date issued of this permit. The Permittee shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by Condition 2.6(a). This permit may also have to be revised or reopened to address such new regulations in accordance to Condition 2.9.

2. <u>Applicable Plans and Programs</u>
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Pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act, the Permittee shall comply with the following applicable requirements. These requirements are applicable to all emission units (including insignificant activities unless specified otherwise in this Section) at the source.

a. Fugitive PM Operating Program

- i. Pursuant to 35 IAC 212.309, this source shall be operated under the provisions of Fugitive PM Operating Program prepared by the Permittee and submitted to the IEPA for its review. The Fugitive PM Operating Program shall be designed to significantly reduce fugitive particulate matter emissions, pursuant to 35 IAC 212.309(a). The Permittee shall comply with the Fugitive PM Operating Program and any amendments to the Fugitive PM Operating Program submitted pursuant to Condition 3.2(a)(ii). As a minimum, the Fugitive PM Operating Program shall include provisions identified in 35 IAC 212.310(a) through (g) and the following:
 - A. A detailed description of the best management practices utilized to achieve compliance with 35 IAC 212.304 through 212.308.
 - B. Estimated frequency of application of dust suppressants by location.
 - C. Such other information as may be necessary to facilitate the IEPA's review of the Fugitive PM Operating Program.
- ii. Pursuant to 35 IAC 212.312, the Fugitive PM Operating Program shall be amended from time to time by the Permittee so that the Fugitive PM Operating Program is current. Such amendments shall be consistent with the requirements set forth by this Condition 3.2(a) and shall be submitted to the IEPA within 30 days of such amendment. Any future revision to the Fugitive PM Operating Program made by the

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Permittee during the permit term is automatically incorporated by reference provided the revision is not expressly disapproved, in writing, by the IEPA within 30 days of receipt of the revision. In the event that the IEPA notifies the Permittee of a deficiency with any revision to the Fugitive PM Operating Program, the Permittee shall be required to revise and resubmit the Fugitive PM Operating Program within 30 days of receipt of notification to address the deficiency pursuant to Section 39.5(7)(a) of the Act.

- iii. The Fugitive PM Operating Program, as submitted by the Permittee on 9/15/1987, is incorporated herein by reference. The document constitutes the formal Fugitive PM Operating Program required under 35 IAC 212.310, addressing the control of fugitive particulate matter emissions from all plant roadways, including the iron-making and steel-making roads, storage piles, access areas near storage piles, and other subject operations located at the facility that are subject to 35 IAC 212.309.
- iv. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep a copy of the Fugitive PM Operating Program, any amendments or revisions to the Fugitive PM Operating Program (as required by Condition 3.2(a)), and the Permittee shall also keep a record of activities completed according to the Fugitive PM Operating Program.

b. PM₁₀ Contingency Measure Plan

Should this source become subject to 35 IAC 212.700, then the Permittee shall prepare and operate under a PM₁₀ Contingency Measure Plan reflecting the PM₁₀ emission reductions as set forth in 35 IAC 212.701 and 212.703. The Permittee shall, within 90 days after the date this source becomes subject to 35 IAC 212.700, submit a request to modify this CAAPP permit in order to include a new, appropriate PM₁₀ Contingency Measure Plan.

c. Episode Action Plan

- i. Pursuant to 35 IAC 244.141, the Permittee shall have on file with the IEPA an Episode Action Plan for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The Episode Action Plan shall contain the information specified in 35 IAC 244.144.
- ii. The Permittee shall immediately implement the appropriate steps described in the Episode Action Plan should an air pollution alert or emergency be declared, as required by 35 IAC 244.169, or as may otherwise be required under 35 IAC 244, Appendix D.
- iii. Pursuant to 35 IAC 244.143(d), if an operational change occurs at the source which invalidates the Episode Action Plan, a revised Episode Action Plan shall be submitted to the IEPA for review within 30 days of the change and is automatically incorporated by reference provided the revision is not expressly disapproved, in writing, by the IEPA within 30 days of receipt of the revision. In the event that the IEPA notifies the Permittee of a deficiency with any revision to the Episode Action Plan, the Permittee shall be required to revise and resubmit the Episode Action Plan within 30 days of receipt of notification to address the deficiency pursuant to Section 39.5(7)(a) of the Act.
- iv. The Episode Action Plan, as submitted by the Permittee on August 5, 2014, is incorporated herein by reference. The document constitutes the formal Episode Action Plan required by 35 IAC 244.142, addressing the actions that will be implemented to reduce SO₂, PM₁₀, NO₂, CO and VOM emissions from various emissions units in the event of a yellow alert, red alert or emergency issued under 35 IAC 244.161 through 244.165.
- v. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep a copy of the Episode Action Plan, any amendments or revisions to the Episode Action Plan (as

required by Condition 3.2(c)), and the Permittee shall also keep a record of activities completed according to the Episode Action Plan.

d. Risk Management Plan (RMP)

Should this stationary source, as defined in 40 CFR 68.3, become subject to the federal regulations for Chemical Accident Prevention in 40 CFR Part 68, then the Permittee shall submit a compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or submit a certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan, as part of the annual compliance certification required by Condition 2.6(a). This condition is imposed in this permit pursuant to 40 CFR 68.215(a)(2)(i) and (ii).

3. Title I Requirements

As of the date of issuance of this permit, there are no source-wide Title I requirements that need to be included in this Condition.

4. Synthetic Minor Limits

As of the date of issuance of this permit, there are no source-wide synthetic minor limits that need to be included in this Condition.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows:
 - I. Requirements in Conditions 3.1(a)(i) and 3.1(b).
 - II. Requirements in Conditions 3.2(a) and 3.2(C).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
 - A. Date and time of the deviation.
 - B. Emission unit(s) and/or operation involved.
 - C. The duration of the event.
 - D. Probable cause of the deviation.
 - E. Corrective actions or preventative measures taken.
- iv. All deviation reports required in this Permit shall be identified, summarized, and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).

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b. Semiannual Reporting

- i. Pursuant to Section 39.5(7)(f)(i) of the Act, the Permittee shall submit Semiannual Monitoring Reports to the IEPA, Air Compliance Section, summarizing required monitoring as part of the Compliance Methods in this Permit submitted every six months as follows, unless more frequent reporting is required in other parts of this permit.

<u>Monitoring Period</u>	<u>Report Due Date</u>
January through June	July 31
July through December	January 31

- ii. The Semiannual Monitoring Report must be certified by a Responsible Official consistent with Condition 2.6(b).

c. Annual Emissions Reporting

Pursuant to 35 IAC Part 254, the Source shall submit an Annual Emission Report to the Air Quality Planning Section, due by May 1 of the year following the calendar year in which the emissions took place. All records and calculations upon which the verified and reported data are based must be retained by the source.

Section 4 - Emission Unit Requirements

4.1 Laminators and Flexographic Presses with Oxidizers

1. Emission Units and Operations

<i>Emission Units</i>	<i>Pollutants Being Regulated</i>	<i>Original Construction Date</i>	<i>Modification/Reconstruction Date</i>	<i>Air Pollution Control Devices or Measures</i>	<i>Monitoring Devices</i>
Laminator No. 1 & Dryer (3.2 mmBtu/hr)	PM and VOM	1987	N/A	Oxidizers (Reeco 2, Adwest 3 or Reeco 1*), and Concentrator/Oxidizer	Combustion Temperature Monitors
Laminator No. 2 & Dryer (1.6 mmBtu/hr)	PM and VOM	Pre-1985	N/A	Oxidizers (Reeco 2, Adwest 3 or Reeco 1*), and Concentrator/Oxidizer	Combustion Temperature Monitors
Laminator No. 4 & Dryer (1.2 mmBtu/hr)	PM and VOM	Pre-1985	N/A	Oxidizers (Reeco 2, Adwest 3 or Reeco 1*), and Concentrator/Oxidizer	Combustion Temperature Monitors
Flexographic Press No. 9 & Dryer (2.0 mmBtu/hr)	PM and VOM	2000	N/A	Oxidizers (Reeco 2, Adwest 3 or Reeco 1*), and Concentrator/Oxidizer	Combustion Temperature Monitors
Flexographic Press No. 10 & Dryer (1.57 mmBtu/hr)	PM and VOM	2004	N/A	Oxidizers (Reeco 2, Adwest 3 or Reeco 1*), and Concentrator/Oxidizer	Combustion Temperature Monitors
Flexographic Press No. 11 & Dryer (1.57 mmBtu/hr)	PM and VOM	2007	N/A	Oxidizers (Reeco 2, Adwest 3 or Reeco 1*), and Concentrator/Oxidizer	Combustion Temperature Monitors
Flexographic Press No. 12 & Dryer (1.2 mmBtu/hr)	PM and VOM	2013	N/A	Oxidizers (Reeco 2, Adwest 3 or Reeco 1*), and Concentrator/Oxidizer	Combustion Temperature Monitors

* Backup device available during outage of primary oxidizer(s).

2. Applicable Requirements

For the emission units in Condition 4.1.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit.

ii. Compliance Method (Opacity Requirements)

Monitoring

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- A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on each press and laminator or common stack in accordance with Method 22 for visible emissions at least once every calendar year. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the press, maintenance and repair and/ or adjustment of operation. If corrective action was taken the Permittee shall perform a follow-up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 and Section 7.1 shall be conducted within one week in accordance with Condition 2.4.

Recordkeeping

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each observation for opacity conducted. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.
- C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for all opacity measurements made in accordance with USEPA Method 9.

b. i. Particulate Matter Requirements (PM)

- A. Pursuant to 35 IAC 212.321(a), no person shall cause or allow the emission of PM into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of PM from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c). (See also Condition 7.2).

ii. Compliance Method (PM Requirements)

Recordkeeping

- A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall keep the following records related to PM emissions:
- I. The hours of operation for each printing press and laminator, hr/mo and hr/yr.
- II. The emissions of PM from each printing line and laminator, lb/mo and ton/yr (12 month rolling average), with supporting calculations, which address the hourly limits of 35 IAC 212.321.

c. i. Volatile Organic Material Requirements (VOM)

- A. Pursuant to 35 IAC 218.401(c)(3), the flexographic presses shall be equipped with capture systems and control devices that provide an overall reduction in VOM of at least 80 percent.
- B. Pursuant to 35 IAC 218.207, the laminating lines shall be equipped with capture systems and control devices that provide 81 percent reduction in the overall emissions of VOM from each line and each control device is required to be 90 percent efficient.

Section 4 - Emission Unit Requirements
4.1 - Laminators and Flexographic Presses with Oxidizers

C. Pursuant to Construction Permits 05060037 and 13040029 flexographic printing presses and laminators are subject to the following: [T1]

- I. The capture system and control system shall be operated to achieve a minimum of 95% reduction in overall emissions of VOM (combination of capture and control efficiency).
- II. The enclosure for the affected presses and laminators shall be designed, operated, and maintained to provide permanent total enclosure, in accordance with the criteria in 35 IAC 218, Appendix B, Procedure T. It is assumed to be 100% if it meets the criteria in Procedure T.
- III. Notwithstanding 35 IAC 218.106, seasonal shutdown of the control system for the affected presses and laminators from November 1 through March 31 of the following year is not allowed.
- IV. The affected presses and laminators shall only use natural gas for fuel.
- V. The total VOM usage of the flexographic printing press No. 12, including VOM in ink, coating and solvents, shall not exceed 53.2 tons/month and 532 tons/year.
- VI. VOM emissions from flexographic printing press No. 12 shall not exceed 2.7 tons/month and 26.6 tons/year.
- VII. The VOM usage of the flexographic printing press No. 11 shall not exceed the following limits:

 Solvent VOM usage: 24,725 lbs/month and 124 tons/year
 Ink and coating VOM usage: 21,570 lbs/month and 108 tons/year
- VIII. VOM emissions from the flexographic printing press No. 11 shall not exceed 1.2 tons/month and 11.6 tons/year. These limits are based on the maximum material usage and the minimum overall control efficiency stated in the application.

D. Pursuant to Construction Permit #94120012 the laminators are subject to the following: [T1]

- I. Usage of VOM containing materials on the presses and laminators below shall not exceed the following limits:

	VOM Within Printing/Laminating Solvents		VOM Within Inks/Adhesives	
	<u>(Lbs/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Lbs/Mo)</u>	<u>(Tons/Yr)</u>
L1, L2 and L4	115,052	641	184,948	1,017

- II. Emissions of VOM from the following laminators shall not exceed the following limits:

	VOM Emissions	
	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Group 1: L1, L2 and L4	9.0	99.9

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4.1 - Laminators and Flexographic Presses with Oxidizers

E. Pursuant to Construction Permits# 00030115 and 01020035 flexographic printing presses are subject to the following: [T1]

I. Usage of VOM containing materials on the presses and laminators below shall not exceed the following limits:

	VOM Within Printing/Laminating Solvents (Lbs/Month)	(Tons/Year)	VOM Within Inks/Adhesives (Lbs/Month)	(Tons/Year)
FP10	19,780	99	17,256	86

II. Emissions of VOM from the following presses shall not exceed the following limits:

	VOM Emissions	
	(Tons/Month)	(Tons/Year)
FP-9	1.1	11.1
FP-10	1.1	11.1

F. The thermal oxidizer's combustion chambers shall be preheated to the manufacturer's recommended temperature but not lower than 1400 degrees F, before the laminating or printing process is begun; this temperature shall be maintained during the laminating and printing processes.

G. The catalytic oxidizer combustion chamber (Concentrator/Oxidizer) shall be preheated to at least the manufacturer's recommended temperature and this temperature shall be maintained during the regeneration of the concentrator.

ii. Compliance Method (VOM Requirements)

Monitoring

A. Pursuant to 39.5(7)(a) of the Act, the Permittee shall:

I. For each thermal oxidizer install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder, pursuant to 40 CFR 63.828(a)(4)(i). The device shall have an accuracy of ± 1 percent of the temperature being monitored in $^{\circ}\text{C}$ or $\pm 1^{\circ}\text{C}$, whichever is greater. The thermocouple or temperature sensor shall be installed in the combustion chamber at a location in the combustion zone.

II. For the catalytic oxidizer, install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device shall be capable of monitoring temperature with an accuracy of ± 1 percent of the temperature being monitored in $^{\circ}\text{C}$ or $\pm 1^{\circ}\text{C}$, whichever is greater. The thermocouple or temperature sensor shall be installed in the vent stream at the nearest feasible point to the catalyst bed inlet.

B. Pursuant to 35 IAC 218.105(d), an owner or operator that uses an afterburner/oxidizer to comply with any Section of 35 IAC Part 218 shall comply with the following:

I. Use an Illinois EPA and USEPA approved continuous monitoring equipment which is installed, calibrated, maintained, and operated according to vendor specifications at all times the control device is in use. The continuous monitoring equipment must monitor the combustion chamber temperature of each afterburner.

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- II. Install, calibrate, operate and maintain, in accordance with manufacturer's specifications, a continuous recorder on the temperature monitoring device, such as a strip chart, recorder or computer, having an accuracy of ± 1 percent of the temperature measured in degrees Celsius or $\pm 0.5^{\circ}\text{C}$, whichever is greater.
- C. Pursuant to Construction Permits 05060037 and 13040029 compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month average).

Testing

- D. Pursuant to 35 IAC 218.105(a), upon request the VOM content of coatings and inks shall be determined by Method 24, 40 CFR Part 60, Appendix A. Method 24 testing provided by the manufacturer is sufficient for this requirement.
 - I. The manufacturer's specifications for VOM contents for coatings and cleaning inks may be used if such manufacturer's specifications are based on the results of tests of VOM content conducted in accordance with Method 24 and/or Method 24A of 40 CFR 60, Appendix A, and the Permittee's records directly reflect the application of such material and separately account for any additions of solvent.
- E. Pursuant to 39.5(7)(b) and (d) of the Act, the Permittee must test the laminators and flexographic printing presses capture system and control devices for compliance with the limitations in Condition 4.1.2(c)(i)(C) and (D) as specified below:
 - I. The Permittee must verify the capture system meet the specifications of Permanent Total Enclosure (PTE) given in Method 204 of Appendix M of 40 CFR 51 within 5 years of the issue date of this permit and every 20 years thereafter.
 - II. The control devices destruction efficiencies must be tested in accordance with 35 IAC 218.105(d) within 5 years of the issue date of this permit and every 5 years thereafter.
 - III. The capture system efficiency and control device destruction efficiency must be retested within 180 calendar days of any capture system modification or control device replacement which would impact previously completed analysis results.
- F. Pursuant to Section 39.5(7)(d) of the Act, within 90 days of a written request from the Illinois EPA, tests shall be performed that will allow evaluation of compliance of any existing line, with 35 IAC 218.207, 35 IAC 218.401(c)(3) and Conditions 4.1.2(c)(i)(C) and (D). [T1]
 - I. These tests shall be performed by an approved testing service, under conditions which are representative of maximum emissions.
 - II. These tests shall be performed to measure overall VOM control efficiency, as measured by USEPA Reference Method 18 or 25. Any other VOM test methods used shall be test methods listed in 35 IAC 218.105.
- G. The Permittee must comply with the requirements of Sections 7.1 for any testing completed to satisfy the requirements of this permit
- H. If the Permittee intends to take credit for VOM containing waste shipped off-site, then the percent concentration of solvent in the VOM containing

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waste from the presses and laminators shall be determined according to USEPA Test Methods for Evaluation of Solid Waste, Physical/Chemical Methods (SW-846), Test Method 8260.

Recordkeeping

- I. Pursuant to 35 IAC 218.211(e)(2), the owner or operator shall collect and record the following:
 - I. Control device monitoring data each day the oxidizers and concentrator operate;
 - II. A log of the operating time for the capture system, control device, monitoring equipment and the printing/coating operation; and
 - III. A maintenance log for the capture system, control device and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages.
- J. Pursuant to 39.5(7)(b) of the Act, the Permittee shall maintain the following records:
 - I. For each group of emission unit:
 - 1. Date;
 - 2. Product;
 - 3. Adhesive, ink, or solvent code;
 - 4. Gallons of adhesive and coatings used per month;
 - 5. Gallons of ink used per month; and.
 - 6. Gallons of coating and laminating solvent used per month.
 - II. For each adhesive, ink, and solvent used, a record of the following information shall be kept at the facility and updated as new adhesives and inks are added:
 - 1. Identification code of adhesive, ink, or solvent;
 - 2. Description of adhesive, ink, or solvent;
 - 3. Supplier of adhesive, ink, or solvent;
 - 4. Supplier's identification code or product number; and
 - 5. Density of adhesive, ink or solvent.
 - III. Monthly VOM emissions from each group of laminators and flexographic presses calculated in accordance with Condition 7.1.12.
 - IV. The most recent stack test report for each oxidizer.
 - V. Results of VOM content testing for VOM containing waste, if applicable.

d. i. Work Practice Requirements

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4.1 - Laminators and Flexographic Presses with Oxidizers

- A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall maintain and operate each press, laminator and air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions and the manufacturer(s) maintenance procedures, as specified.
- ii. Compliance Method (Work Practice Requirements)

Monitoring

- A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall perform preventive maintenance on each press, laminator and air pollution control equipment in accordance with the manufacturer(s) recommendation(s).

Recordkeeping

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of preventive maintenance performed, as required by Condition 4.1.2(d)(ii)(A), along with a maintenance and repair log. These records shall include, at a minimum:
- I. Date and time of the preventive maintenance activity;
 - II. Name(s) of personnel performing the preventative maintenance;
 - III. Identification of the press, laminator or air pollution control equipment on which preventive maintenance is being performed;
 - IV. A description of all maintenance and repair activities performed including if the activity resulted in a modification or reconstruction of the piece of equipment; and
 - V. A document demonstrating the preventative maintenance activity/activities recommended by the manufacturer(s) that are to be performed on each press.

e. i. Hazardous Air Pollutant Requirements (HAP)

- A. The flexographic presses are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR 63, Subparts A and KK, because the source is a major source of hazardous air pollutants (HAP), as defined in 40 CFR 63.2, at which publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses are operated. The Illinois EPA administers the NESHAP for subject sources in Illinois pursuant to a delegation agreement with the USEPA.
- B. The standards for wide-web flexographic printing are listed in 40 CFR 63.825 with main methods to comply but with variations such as use of a monthly average. These are as follows and the owner or operator is required to comply with one of the options:
- I. Emissions capture and control equipment that reduces HAP emissions by 95% (5% of the amount used); or
 - II. Limit HAP content to 4% of the mass of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners and other materials applied; or
 - III. Limit HAP emissions to 20% of the mass of solids applied; or

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4.1 - Laminators and Flexographic Presses with Oxidizers

- IV. Combinations of the above such as if the HAP content is greater than 4% and control efficiency less than 95%, the two may be combined to reduce HAP content to under 4% after control.
 - C. Table 1 of Subpart KK lists the requirements of Subpart A that are applicable.
 - D. The laminators are subject to the NESHAP for Paper and Other Web Coating Operations, 40 CFR 63 Subparts A and JJJJ because the laminators are operated and this source is a major source of HAP emissions. Pursuant to 40 CFR 63.3320 each coating line must limit organic HAP emissions to one of the following levels:
 - I. No more than 5 percent of the organic HAP applied for each month (95 percent reduction) at existing affected sources, and no more than 2 percent of the organic HAP applied for each month (98 percent reduction) at new affected sources. This source is an existing facility therefore 95 percent reduction is the applicable requirement.
 - E. Pursuant to 40 CFR 63.3321, for any web coating line or group of web coating lines for which an add-on control device is used the Permittee must meet the applicable operating limits specified in Table 1 of 40 CFR 63 Subpart JJJJ. The Permittee must establish the operating limits during the performance test according to the requirements in 40 CFR 63.3360(e). The Permittee must meet the operating limits at all times after the limits are established.
- ii. Compliance Method (HAP Requirements)

Monitoring and Testing

- A. Pursuant to 40 CFR 63.828(a), following the date on which the initial performance test of a control device is completed, to demonstrate continuing compliance with the standard, the owner or operator shall monitor and inspect each control device required to comply with 40 CFR 63.824-63.825 to ensure proper operation and maintenance by implementing the applicable requirements in paragraph 40 CFR 63.828 (a)(1) through (a)(5).
- B. An owner or operator complying with the requirements of 40 CFR 63.824-63.825 through the use of an oxidizer and demonstrating continuous compliance through monitoring of an oxidizer operating parameter shall:
 - I. Pursuant to 40 CFR 63.828 and 40 CFR 63.3350(e), for an oxidizer other than a catalytic oxidizer, install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device shall have an accuracy of ± 1 percent of the temperature being monitored in $^{\circ}\text{C}$ or $\pm 1^{\circ}\text{C}$, whichever is greater. The thermocouple or temperature sensor shall be installed in the combustion chamber at a location in the combustion zone.
 - II. Pursuant to 40 CFR 63.828 and 40 CFR 63.3350(e), for a catalytic oxidizer, install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device shall be capable of monitoring temperature with an accuracy of ± 1 percent of the temperature being monitored in $^{\circ}\text{C}$ or $\pm 1^{\circ}\text{C}$, whichever is greater. The thermocouple or temperature sensor shall be installed in the vent stream at the nearest feasible point to the catalyst bed inlet.
- C. Pursuant to 40 CFR 63.3350(f), Capture system monitoring. If you are complying with the emission standards in 40 CFR 63.3320 through the use of a

Section 4 - Emission Unit Requirements
4.1 - Laminators and Flexographic Presses with Oxidizers

capture system and control device for one or more web coating lines, you must develop a site-specific monitoring plan containing the information specified in paragraphs (f)(1) and (2) of this section for these capture systems. You must monitor the capture system in accordance with paragraph (f)(3) of this section. You must make the monitoring plan available for inspection by the permitting authority upon request.

I. The monitoring plan must:

1. Identify the operating parameter to be monitored to ensure that the capture efficiency determined during the initial compliance test is maintained; and
2. Explain why this parameter is appropriate for demonstrating ongoing compliance; and
3. Identify the specific monitoring procedures.

II. The monitoring plan must specify the operating parameter value or range of values that demonstrate compliance with the emission standards in 40 CFR 63.3320. The specified operating parameter value or range of values must represent the conditions present when the capture system is being properly operated and maintained.

III. You must conduct all capture system monitoring in accordance with the plan.

IV. Any deviation from the operating parameter value or range of values which are monitored according to the plan will be considered a deviation from the operating limit.

V. You must review and update the capture system monitoring plan at least annually.

D. Pursuant to 40 CFR 63.3360(e) Control device efficiency, if you are using an add-on control device other than solvent recovery, such as an oxidizer, to comply with the emission standards in 40 CFR 63.3320, you must conduct a performance test to establish the destruction or removal efficiency of the control device according to the methods and procedures in paragraphs (e)(1) and (2) of this section. During the performance test, you must establish the operating limits required by 40 CFR 63.3321 according to paragraph (e)(3) of this section.

E. Pursuant to 40 CFR 63.3360(f) Capture efficiency, You may assume your capture efficiency equals 100 percent if your capture system is a permanent total enclosure (PTE). You must confirm that your capture system is a PTE by demonstrating that it meets the requirements of section 6 of EPA Method 204 of 40 CFR Part 51, Appendix M, and that all exhaust gases from the enclosure are delivered to a control device.

Recordkeeping

F. Pursuant to 40 CFR 63.829, each owner or operator of an affected source subject to 40 CFR Part 63 Subpart KK, shall maintain the records specified in 40 CFR 63.829.

G. Pursuant to 40 CFR 63.3410, each owner or operator of subject to 40 CFR Part 63 Subpart JJJJ must maintain the records specified in paragraphs 40 CFR 63.3410(a)(1) and (2) on a monthly basis in accordance with the requirements of 40 CFR 63.10(b)(1).

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3. Non-Applicability Determinations

- a. The presses are not subject to the New Source Performance Standards (NSPS) for Subpart QQ—Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing, 40 CFR Part 60 Subpart QQ, because the presses are not publication rotogravure printing presses.
- b. The presses and laminators are not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing, Coating and Dyeing of Fabrics and Other Textiles 40 CFR 63, Subpart OOOO, because the presses and laminators do not coat or print fabric or other textiles.
- c. Pursuant to 35 IAC 218.187(a)(2)(B)(i) and (vii), the flexographic presses and laminators are exempt from any requirements of 35 IAC 218.187, which includes 35 IAC 218.187(b),(c),(d),(e),(f), and (g) because there are exemptions for flexible packaging printing, paper coating and film coating
- d. This permit is issued based on the source not being subject to 35 IAC Part 218, Subpart G, because the source has printing and laminating operations that are subject to 35 IAC 218 Subparts F and H. (35 IAC 218.209 and 218.402(b).

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
 - I. Requirements in Conditions 4.1.2(a)(i), 4.1.2(b)(i), 4.1.2(c)(i), 4.1.2(d)(i) and 4.1.2(e)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
 - A. Date and time of the deviation.
 - B. Emission unit(s) and/or operation involved.
 - C. The duration of the event.
 - D. Probable cause of the deviation.

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Section 4 - Emission Unit Requirements
4.1 - Laminators and Flexographic Presses with Oxidizers

E. Corrective actions or preventative measures taken.

4.2 Fixed Roof Storage Tank

1. Emission Units and Operations

<i>Emission Units</i>	<i>Pollutants Being Regulated</i>	<i>Original Construction Date</i>	<i>Modification/ Reconstruction Date</i>	<i>Air Pollution Control Devices or Measures</i>	<i>Monitoring Devices</i>
4,000 Gallons Fixed Roof Tank, Capable of Storing a VOM or HAP Material	VOM	Pre-1985	N/A	Permanent Submerged Loading pipe	None

2. Applicable Requirements

For the emission units in Condition 4.6.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Work Practices and Control Requirements

Requirements of 35 IAC Part 218 Subpart B:

- A. Pursuant to 35 IAC 218.122(b), no person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 250 gallons, unless such tank is equipped with a permanent submerged loading pipe or an equivalent device approved by the Illinois EPA according to the provisions of 35 IAC 201, and further processed consistent with 35 IAC 218.108.

ii. Compliance Method (Work Practice Requirements)Monitoring

- A. Pursuant to 39.5(7)(a) of the Act, routine inspections shall be conducted once every six months.

Recordkeeping

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of each inspection performed along with a maintenance and repair log. These records shall include, at a minimum: date and time inspections were performed, name(s) of inspection personnel, identification of equipment being inspected, findings of the inspections, operation and maintenance procedures, and a description of any maintenance and repair activities that resulted in a modification or reconstruction of the piece of equipment.
- C. Pursuant to 35 IAC 218.129(f), the Permittee of each storage vessel specified in 35 IAC 218.119 shall maintain readily accessible records of the dimension of the storage vessel and an analysis of the capacity of the storage vessel.

b. i. Operational and Production Requirements

- A. Pursuant to Section 39.5(7)(a) of the Act, the tank is not allowed to store gasoline.

ii. Compliance Method (Operational and Production Requirements)Recordkeeping

- A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of the type of materials stored in the tanks.

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- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of the presence of the submerged loading pipe.
- C. The volatile organic material (VOM) emissions attributable to each organic liquid stored at the source, tons/month, with supporting calculations.
- D. Total emissions of each individual HAP, and combined HAPs, tons/month, with supporting calculations.

3. Non-Applicability Determinations

- a. The tanks are not subject to the New Source Performance Standards (NSPS) for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels), 40 CFR Part 60 Subpart Kb, because the tanks are less than 19,812 gallon pursuant to 40 CFR 60.110b(a).
- b. Pursuant to 35 IAC 218.119(a), the control requirements of 35 IAC 218.120 are not applicable to the tanks because they have a capacity less than 40,000 gallons.
- c. The tank is not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the tank uses passive control measures, such as submerged fill pipe and roof which are not considered control devices.

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
 - I. Requirements in Condition 4.2.2(a)(i) and 4.2.2(b)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.7(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Reports required by Condition 3.7(b).
- iii. The deviation reports shall contain at a minimum the following information:
 - A. Date and time of the deviation.
 - B. Emission unit(s) and/or operation involved.
 - C. The duration of the event.
 - D. Probable cause of the deviation.
 - E. Corrective actions or preventative measures taken.

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Section 5 - Additional Title I Requirements

This Section is reserved for Title I requirements not specified in Sections 3 or 4. As of the date of issuance of this permit, there are no Title I requirements that need to be separately addressed in this Section.

Section 6 - Insignificant Activities Requirements

1. Insignificant Activities Subject to Specific Regulations

Pursuant to 35 IAC 201.210 and 201.211, the following activities at the source constitute insignificant activities. Pursuant to Sections 9.1(d) and 39.5(6)(a) of the Act, the insignificant activities are subject to specific standards promulgated pursuant to Sections 111, 112, 165, or 173 of the Clean Air Act. The Permittee shall comply with the following applicable requirements:

<i>Insignificant Activity</i>	<i>Number of Units</i>	<i>Insignificant Activity Category</i>
Laminator #5 and Laminator #6	2	35 IAC 201.210(a)(3)

a. Applicable Requirements

Pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act, the Permittee shall comply with the following applicable requirements in addition to the applicable requirements in Condition 6.4:

i. Volatile Organic Material Requirements (VOM)

- A. Pursuant to 35 IAC 218.204(c), no owner or operator of a paper coating line shall apply at any time any coating (e.g., glue) in which the VOM content exceeds the emission limitations, as follows:

kg VOM/kg (1b VOM/lb) solids applied	kg VOM/kg (1b VOM/lb) coatings applied
0.40	0.08

ii. Compliance Method (VOM Requirements)

- A. Pursuant to 35 IAC 218.211(c), the Permittee shall collect and record all of the following information and maintain the information at the source:
- I. The name and identification number of each coating as applied on each coating line;
 - II. For coating lines subject to the limitations of 35 IAC 218.204(c), the weight of VOM per weight of solids (or the weight of VOM per weight of coatings, as applicable) in each coating as applied each day on each coating line, and certified product data sheets for each coating.

2. Insignificant Activities in 35 IAC 201.210(a)

In addition to any insignificant activities identified in Condition 6.1, the following additional activities at the source constitute insignificant activities pursuant to 35 IAC 201.210 and 201.211:

<i>Insignificant Activity</i>	<i>Number of Units</i>	<i>Insignificant Activity Category</i>
Storage Tanks No. 1 (6,000 gal), No. 2 (4,000 gal) and No. 4 (4,000 gal)	3	35 IAC 201.210(a)(10)

3. Insignificant Activities in 35 IAC 201.210(b)

Not Applicable

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4. Applicable Requirements

Insignificant activities in Conditions 6.1 and 6.2 are subject to the following general regulatory limits notwithstanding status as insignificant activities. The Permittee shall comply with the following requirements, as applicable:

- a. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122, except as provided in 35 IAC 212.123(b).
- b. Pursuant to 35 IAC 212.321 (see Conditions 7.2(a)), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceed the allowable emission rates specified 35 IAC 212.321 or 212.322 and 35 IAC Part 266.
- c. Pursuant to 35 IAC 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2,000 ppm, except as provided in 35 IAC Part 214.
- d. Pursuant to 35 IAC 218.301, no person shall cause or allow the discharge of more than 8 lbs/hr of organic material into the atmosphere from any emission source, except as provided in 35 IAC 218.302, 218.303, 218.304 and the following exception: If no odor nuisance exists the limitation of 35 IAC 215 Subpart K shall apply only to photochemically reactive material.
- e. Pursuant to 35 IAC 218.122(b), no person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 250 gal, unless such tank is equipped with a permanent submerged loading pipe, submerged fill, or an equivalent device approved by the IEPA according to 35 IAC Part 201 or unless such tank is a pressure tank as described in 35 IAC 215.121(a) or is fitted with a recovery system as described in 35 IAC 215.121(b)(2). Exception as provided in 35 IAC 218.122(c): If no odor nuisance exists the limitations of 35 IAC 215.122 shall only apply to the loading of volatile organic liquid with a vapor pressure of 2.5 psia or greater at 70°F.

5. Compliance Method

Pursuant to Section 39.5(7)(b) of the Act, the source shall maintain records of the following items for the insignificant activities in Conditions 6.1 and 6.2:

- a. List of all insignificant activities, including insignificant activities added as specified in Condition 6.6, the categories the insignificant activities fall under, and supporting calculations as needed.
- b. Potential to emit emission calculations before any air pollution control device for each insignificant activity.

6. Notification Requirements for Insignificant Activities

The source shall notify the IEPA accordingly to the addition of insignificant activities:

a. Notification 7 Days in Advance

- i. Pursuant to 35 IAC 201.212(b), 35 IAC 201.146(kkk), and Sections 39.5(12)(a) and (b) of the Act; for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a)(1) and 201.211 and is not currently identified in Conditions 6.1 or 6.2, a notification to the IEPA Permit Section 7 days in advance of the addition of the insignificant activity is required. A construction

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permit is not required. Addresses are included in Attachment 3. The notification shall include the following pursuant to 35 IAC 201.211(b):

- A. A description of the emission unit including the function and expected operating schedule of the unit.
 - B. A description of any air pollution control equipment or control measures associated with the emission unit.
 - C. The emissions of regulated air pollutants in lb/hr and ton/yr.
 - D. The means by which emissions were determined or estimated.
 - E. The estimated number of such emission units at the source.
 - F. Other information upon which the applicant relies to support treatment of such emission unit as an insignificant activity.
- ii. Pursuant to 35 IAC 201.212(b), 35 IAC 201.146(kkk), and Sections 39.5(12)(a) and (b) of the Act; for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a)(2) through 201.210(a)(18) and is not currently identified in Conditions 6.1 or 6.2, a notification to the IEPA Permit Section 7 days in advance of the addition of the insignificant activity is required. A construction permit is not required. Addresses are included in Attachment 3.
 - iii. Pursuant to Sections 39.5(12)(a)(i)(b) and 39.5(12)(b)(iii) of the Act, the permit shield described in Section 39.5(7)(j) of the Act (see Condition 2.7) shall not apply to any change made in Condition 6.6(a) above.

b. Notification Required at Renewal

Pursuant to 35 IAC 201.212(a) and 35 IAC 201.146(kkk), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a) and is currently identified in Conditions 6.1 or 6.2, a notification is not required until the renewal of this permit. A construction permit is not required.

c. Notification Not Required

Pursuant to 35 IAC 201.212(c) and 35 IAC 201.146(kkk), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(b) as describe in Condition 6.3, a notification is not required. A construction permit is not required.

Section 7 - Other Requirements

1. Testing

- a. Pursuant to Section 39.5(7)(a) of the Act, a written test protocol shall be submitted at least sixty (60) days prior to the actual date of testing, unless it is required otherwise in applicable state or federal statutes. The IEPA may at the discretion of the Compliance Section Manager (or designee) accept protocol less than 60 days prior to testing provided it does not interfere with the IEPA's ability to review and comment on the protocol and does not deviate from the applicable state or federal statutes. The protocol shall be submitted to the IEPA, Compliance Section and IEPA, Stack Test Specialist for its review. Addresses are included in Attachment 3. This protocol shall describe the specific procedures for testing, including as a minimum:
 - i. The name and identification of the emission unit(s) being tested.
 - ii. Purpose of the test, i.e., permit condition requirement, IEPA or USEPA requesting test.
 - iii. The person(s) who will be performing sampling and analysis and their experience with similar tests.
 - iv. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the emission unit and any control equipment will be determined.
 - v. The specific determinations of emissions and operation which are intended to be made, including sampling and monitoring locations.
 - vi. The test method(s) that will be used, with the specific analysis method, if the method can be used with different analysis methods. Include if emission tests averaging of 35 IAC 283 will be used.
 - vii. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with detailed justification. This shall be included as a waiver of the test procedures. If a waiver has already been obtained by the IEPA or USEPA, then the waiver shall be submitted.
 - viii. Any proposed use of an alternative test method, with detailed justification. This shall be included as a waiver of the test procedures. If a waiver has already been obtained by the IEPA or USEPA, then the waiver shall be submitted.
 - ix. Sampling of materials, QA/QC procedures, inspections, etc.
- b. The IEPA, Compliance Section shall be notified prior to these tests to enable the IEPA to observe these tests pursuant to Section 39.7(a) of the Act as follows:
 - i. Notification of the expected date of testing shall be submitted in writing a minimum of thirty (30) days prior to the expected test date, unless it is required otherwise in applicable state or federal statutes.
 - ii. Notification of the actual date and expected time of testing shall be submitted in writing a minimum of five (5) working days prior to the actual date of the test. The IEPA may at its discretion of the Compliance Section Manager (or designee) accept notifications with shorter advance notice provided such notifications will not interfere with the IEPA's ability to observe testing.
- c. Copies of the Final Report(s) for these tests shall be submitted to the IEPA, Compliance Section within fourteen (14) days after the test results are compiled and finalized but

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no later than ninety (90) days after completion of the test, unless it is required otherwise in applicable state or federal statutes or the IEPA may at the discretion of the Compliance Section Manager (or designee) an alternative date is agreed upon in advance pursuant to Section 39.7(a) of the Act. The Final Report shall include as a minimum:

- i. General information including emission unit(s) tested.
 - ii. A summary of results.
 - iii. Discussion of conditions during each test run (malfunction/breakdown, startup/shutdown, abnormal processing, etc.).
 - iv. Description of test method(s), including description of sampling points, sampling train, analysis equipment, and test schedule.
 - v. Detailed description of test conditions, including:
 - A. Process information, i.e., mode(s) of operation, process rate, e.g. fuel or raw material consumption.
 - B. Control equipment information, i.e., equipment condition and operating parameters during testing.
 - C. A discussion of any preparatory actions taken, i.e., inspections, maintenance and repair.
 - vi. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration.
 - vii. An explanation of any discrepancies among individual tests or anomalous data.
 - viii. Results of the sampling of materials, QA/QC procedures, inspections, etc.
 - ix. Discussion of whether protocol was followed and description of any changes to the protocol if any occurred.
 - x. Demonstration of compliance showing whether test results are in compliance with applicable state or federal statutes.
- d. Copies of all test reports and other test related documentation shall be kept on site as required by Condition 2.5(b) pursuant to Section 39.5(7)(e)(ii) of the Act.

2. PM Process Weight Rate Requirements

a. New Process Emission Units - 35 IAC 212.321

New Process Emission Units For Which Construction or Modification Commenced On or After April 14, 1972. [35 IAC 212.321]

- i. No person shall cause or allow the emission of PM into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of PM from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c). See Condition 7.2(a)(iii) below. [35 IAC 212.321(a)]
- ii. Interpolated and extrapolated values of the data in 35 IAC 212.321(c) shall be determined by using the equation: [35 IAC 212.321(b)]

$$E = A(P)^B$$

Where:

P = Process weight rate (T/hr)
E = Allowable emission rate (lbs/hr)

A. Process weight rates of less than 450 T/hr:

A = 2.54
B = 0.53

B. Process weight rates greater than or equal to 450 T/hr:

A = 24.8
B = 0.16

iii. Limits for New Process Emission Units [35 IAC 212.321(c)]:

<u>P</u> <u>(T/hr)</u>	<u>E</u> <u>(lbs/hr)</u>	<u>P</u> <u>(T/hr)</u>	<u>E</u> <u>(lbs/hr)</u>
0.05	0.55	25.00	14.00
0.10	0.77	30.00	15.60
0.20	1.10	35.00	17.00
0.30	1.35	40.00	18.20
0.40	1.58	45.00	19.20
0.50	1.75	50.00	20.50
0.75	2.40	100.00	29.50
1.00	2.60	150.00	37.00
2.00	3.70	200.00	43.00
3.00	4.60	250.00	48.50
4.00	5.35	300.00	53.00
5.00	6.00	350.00	58.00
10.00	8.70	400.00	62.00
15.00	10.80	450.00	66.00
20.00	12.50	500.00	67.00

3. Emissions Reduction Market System (ERMS) Requirements

- a. Pursuant to 35 IAC Part 205, this source is considered a "participating source" for purposes of the ERMS.
- b. Obligation to Hold Allotment Trading Units (ATUs)
 - i. Pursuant to 35 IAC 205.150(c)(1) and 35 IAC 205.720, and as further addressed by Condition 7.3(g), as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than the ATU equivalent of its VOM emissions during the preceding seasonal allotment period (May 1 - September 30), not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation", as described in Condition 7.3(d):
 - A. VOM emissions from insignificant emission units and activities as identified in Section 6 of this permit, in accordance with 35 IAC 205.220.
 - B. Excess VOM emissions associated with startup, malfunction, or breakdown of an emission unit as authorized in Section 4 of this permit, in accordance with 35 IAC 205.225.
 - C. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3).
 - D. Excess VOM emissions that are a consequence of an emergency as approved by the IEPA, pursuant to 35 IAC 205.750.
 - E. VOM emissions from certain new and modified emission units as addressed by Condition 7.3(g)(ii), if applicable, in accordance with 35 IAC 205.320(f).
 - ii. In accordance with 35 IAC 205.150(c)(2), notwithstanding the Condition 7.3(b)(i) above, if a source commences operation of a major modification, pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its seasonal VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions in Section 4 of this permit.
- c. Market Transactions
 - i. As specified in 35 IAC 205.610(a), the source shall apply to the IEPA for and obtain authorization for a Transaction Account prior to conducting any market transactions.
 - ii. Pursuant to 35 IAC 205.610(b), the Permittee shall promptly submit to the IEPA any revisions to the information submitted for its Transaction Account.
 - iii. Pursuant to 35 IAC 205.620(a), the source shall have at least one account officer designated for its Transaction Account.
 - iv. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the IEPA, in accordance with 35 IAC 205.620, and the transfer must be submitted to the IEPA for entry into the Transaction Account database.
- d. Emissions Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 7.3(b), it shall provide emissions excursion compensation in accordance with the following:

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- i. Upon receipt of an Excursion Compensation Notice issued by the IEPA, the source shall purchase ATUs from the ACMA in the amount specified by the notice, as follows:
 - A. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or
 - B. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emissions excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.
- ii. If requested in accordance with paragraph 7.3(d)(iii) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the IEPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.
- iii. Pursuant to 35 IAC 205.720(c), within 15 days after receipt of an Excursion Compensation Notice, the Owner or Operator may request that ATUs equivalent to the amount specified be deducted from the source's next seasonal allotment by the IEPA, rather than purchased from the ACMA.

e. Quantification of Seasonal VOM Emissions

- i. Pursuant to 35 IAC 205.315(b), the methods and procedures specified in Sections 3 and 4 of this permit for determining VOM emissions and compliance with VOM emission limitations shall be used for determining seasonal VOM emissions for purposes of the ERMS, with the following exceptions:

No exceptions

- ii. In accordance with 35 IAC 205.750, the Permittee shall report emergency conditions at the source to the IEPA if the Permittee intends to deduct VOM emissions in excess of the technology-based emission rates normally achieved that are attributable to the emergency from the source's seasonal VOM emissions for purposes of the ERMS. These reports shall include the information specified by 35 IAC 205.750(a), and shall be submitted in accordance with the following:
 - A. An initial emergency conditions report within two days after the time when such excess emissions occurred due to the emergency.
 - B. A final emergency conditions report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

f. Annual Account Reporting

- i. Pursuant to 35 IAC 205.300, for each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emissions Report, seasonal VOM emissions information to the IEPA for the seasonal allotment period. This report shall include the following information:
 - A. Actual seasonal emissions of VOM from the source.
 - B. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations.
 - C. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in 35 IAC 205.337.

- D. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the associated emergency conditions report that has been approved by the IEPA.
- E. If a source's baseline emissions have been adjusted due to a Variance, Consent Order, or CAAPP permit Compliance Schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3).
- F. If a source is operating a new or modified emission unit for which three years of operational data is not yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.
- ii. This report shall be submitted by November 30 of each year, for the preceding seasonal allotment period.

g. Allotment of ATUs to the Source

- i. A. The allotment of ATUs to this source is 557 ATUs per seasonal allotment period.
- B. This allotment of ATUs reflects the IEPA's determination that the source's baseline emissions were 63.2868 tons per season.
- C. The source's allotment reflects 88% of the baseline emissions (12% reduction), except for the VOM emissions from specific emission units excluded from such reduction, pursuant to 35 IAC 205.405, including units complying with MACT or using BAT, as identified in Condition 7.3(i) of this permit.
- D. ATUs will be issued to the source's Transaction Account by the IEPA annually. These ATUs will be valid for the seasonal allotment period following issuance and, if not retired in this season, the next seasonal allotment period.
- ii. Contingent Allotments for New or Modified Emission Units

The source was not issued a construction permit prior to January 1, 1998 for the following new or modified emission units:

<i>Emission Unit</i>	<i>Construction Permit No.</i>	<i>Date Issued</i>
Flexographic Press No. 12 & Dryer	13040029	2013
Flexographic Press No. 11 & Dryer	05060037	2007
Flexographic Press No. 10 & Dryer	01020035	2004
Flexographic Press No. 9 & Dryer	00030115	2000

In accordance with 35 IAC Part 205, for the above referenced emission units, the source is required to hold the appropriate amount of ATUs for these emission units.

- iii. Notwithstanding the above, part or all of the above ATUs will not be issued to the source in circumstances as set forth in 35 IAC Part 205, including:
- A. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630.

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- B. Deduction of ATUs as a consequence of emissions excursion compensation, in accordance with 35 IAC 205.720.
- C. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

h. Recordkeeping for ERMS

Pursuant to 35 IAC 205.700(a), the Permittee shall maintain copies of the following documents as its Compliance Master File for purposes of the ERMS:

- i. Seasonal component of the Annual Emissions Report.
- ii. Information on actual VOM emissions, as specified in detail in Sections 3 and 4 of this permit and Condition 7.3(e)(i).
- iii. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

i. Exclusions from Further Reductions

- i. A. Pursuant to 35 IAC 205.405(a), VOM emissions from the following emission units shall be excluded from the VOM emissions reductions requirements specified in 35 IAC 205.400(c) and (e) as long as such emission units continue to satisfy the following:
 - I. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the CAA.
 - II. Direct combustion emission units designed and used for comfort heating purposes, fuel combustion emission units, and internal combustion engines.
 - III. An emission unit for which a LAER demonstration has been approved by the IEPA on or after November 15, 1990.
- B. Pursuant to 35 IAC 205.405(a) and (c), the source has demonstrated in its ERMS application and the IEPA has determined that the following emission units qualify for exclusion from further reductions because they meet the criteria as indicated above:

None
- ii. A. Pursuant to 35 IAC 205.405(b), VOM emissions from emission units using BAT for controlling VOM emissions shall not be subject to the VOM emissions reductions requirement specified in 35 IAC 205.400(c) or (e) as long as such emission unit continues to use such BAT.
- B. Pursuant to 35 IAC 205.405(b) and (c), the source has demonstrated in its ERMS application and the IEPA has determined that the following emission units qualify for exclusion from further reductions because these emission units use BAT for controlling VOM emissions as indicated above:

None

4. 40 CFR 63 Subpart A Requirements (NESHAP)

a. 40 CFR 63 Subpart A and KK - National Emission Standards for Hazardous Air Pollutants: Printing and Publishing

Pursuant to 40 CFR 63 Subpart A and KK, the Permittee shall comply with the following applicable General Provisions as indicated:

Table 1 to Subpart KK of Part 63-Applicability of General Provisions to Subpart KK

General provisions reference	Applicable to subpart KK	Comment
\$63.1(a)(1)-(a)(4)	Yes	
\$63.1(a)(5)	No	Section reserved.
\$63.1(a)(6)-(a)(8)	No	
\$63.1(a)(9)	No	Section reserved.
\$63.1(a)(10)-(a)(14)	Yes	
\$63.1(b)(1)	No	Subpart KK specifies applicability.
\$63.1(b)(2)-(b)(3)	Yes	
\$63.1(c)(1)	Yes	
\$63.1(c)(2)	No	Area sources are not subject to subpart KK.
\$63.1(c)(3)	No	Section reserved.
\$63.1(c)(4)	Yes	
\$63.1(c)(5)	No	
\$63.1(d)	No	Section reserved.
\$63.1(e)	Yes	
\$63.2	Yes	Additional definitions in subpart KK.
\$63.3(a)-(c)	Yes	
\$63.4(a)(1)-(a)(3)	Yes	
\$63.4(a)(4)	No	Section reserved.
\$63.4(a)(5)	Yes	
\$63.4(b)-(c)	Yes	
\$63.5(a)(1)-(a)(2)	Yes	
\$63.5(b)(1)	Yes	
\$63.5(b)(2)	No	Section reserved.
\$63.5(b)(3)-(b)(6)	Yes	
\$63.5(c)	No	Section reserved.
\$63.5(d)	Yes	
\$63.5(e)	Yes	
\$63.5(f)	Yes	
\$63.6(a)	Yes	

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7.4 - 40 CFR Subpart A Requirements (NESHAP)

General provisions reference	Applicable to subpart KK	Comment
\$63.6(b)(1)-(b)(5)	Yes	
\$63.6(b)(6)	No	Section reserved.
\$63.6(b)(7)	Yes	
\$63.6(c)(1)-(c)(2)	Yes	
\$63.6(c)(3)-(c)(4)	No	Sections reserved.
\$63.6(c)(5)	Yes	
\$63.6(d)	No	Section reserved.
\$63.6(e)(1)(i)	No	See 63.823(b) for general duty requirement. Any cross-reference to 63.6(e)(1)(i) in any other general provision incorporated by reference shall be treated as a cross-reference to 63.823(b).
\$63.6(e)(1)(ii)	No	
\$63.6(e)(1)(iii)	Yes	
\$63.6(e)(2)	No	Section reserved.
\$63.6(e)(3)	No	
\$63.6(f)(1)	No	
\$63.6(f)(2)-(f)(3)	Yes	
\$63.6(g)	Yes	
\$63.6(h)	No	Subpart KK does not require COMS.
\$63.6(i)(1)-(i)(14)	Yes	
\$63.6(i)(15)	No	Section reserved.
\$63.6(i)(16)	Yes	
\$63.6(j)	Yes	
\$63.7(a)-(d)	Yes	
\$63.7(e)(1)	No	See 63.827 introductory text. Any cross-reference to 63.7(e)(1) in any other general provision incorporated by reference shall be treated as a cross-reference to 63.827 introductory text.
\$63.7(e)(2)-(e)(4)	Yes	
\$63.8(a)(1)-(a)(2)	Yes	
\$63.8(a)(3)	No	Section reserved.
\$63.8(a)(4)	No	Subpart KK specifies the use of solvent recovery devices or oxidizers.
\$63.8(b)	Yes	
\$63.8(c)(1)-(3)	Yes	
\$63.8(c)(4)	No	Subpart KK specifies CMS sampling requirements.
\$63.8(c)(5)	No	Subpart KK does not require COMS.
\$63.8(c)(6)-(c)(8)	Yes	Provisions for COMS are not applicable.
\$63.8(d)(1)-(2)	Yes	
\$63.8(d)(3)	Yes, except for last sentence	

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7.4 - 40 CFR Subpart A Requirements (NESHAP)

General provisions reference	Applicable to subpart KK	Comment
\$63.8(e)-(f)	Yes	
\$63.8(g)	No	Subpart KK specifies CMS data reduction requirements.
\$63.9(a)	Yes	
\$63.9(b)(1)	Yes	
\$63.9(b)(2)	Yes	Initial notification submission date extended.
\$63.9(b)(3)-(b)(5)	Yes	
\$63.9(c)-(e)	Yes	
\$63.9(f)	No	Subpart KK does not require opacity and visible emissions observations.
\$63.9(g)	Yes	Provisions for COMS are not applicable.
\$63.9(h)(1)-(h)(3)	Yes	
\$63.9(h)(4)	No	Section reserved.
\$63.9(h)(5)-(h)(6)	Yes	
\$63.9(i)	Yes	
\$63.9(j)	Yes	
\$63.10(a)	Yes	
\$63.10(b)(1)	Yes	
\$63.10(b)(2)(i)	No	
\$63.10(b)(2)(ii)	No	See 63.829(g) for recordkeeping of occurrence and duration of malfunctions. See 63.829(h) for recordkeeping of actions taken during malfunction. Any cross-reference to 63.10(b)(2)(ii) in any other general provision incorporated by reference shall be treated as a cross-reference to 63.829(g).
\$63.10(b)(2)(iii)	Yes	
\$63.10(b)(2)(iv)-(b)(2)(v)	No	
\$63.10(b)(2)(vi)-(b)(2)(xiv)	Yes	
\$63.10(b)(3)	Yes	
\$63.10(c)(1)	Yes	
\$63.10(c)(2)-(c)(4)	No	Sections reserved.
\$63.10(c)(5)-(c)(8)	Yes	
\$63.10(c)(9)	No	Section reserved.
\$63.10(c)(10)	No	See 63.830(b)(6)(v) for reporting malfunctions. Any cross-reference to 63.10(c)(10) in any other general provision incorporated by reference shall be treated as a cross-reference to 63.830(b)(6)(v).
\$63.10(c)(11)	No	See 63.830(b)(6)(v) for reporting malfunctions. Any cross-reference to 63.10(c)(11) in any other general provision incorporated by reference shall be treated as a cross-reference to 63.830(b)(6)(v).
\$63.10(c)(12)-(c)(14)	Yes	
\$63.10(c)(15)	No	

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7.4 - 40 CFR Subpart A Requirements (NESHAP)

General provisions reference	Applicable to subpart KK	Comment
\$63.10(d)(1)-(d)(2)	Yes	
\$63.10(d)(3)	No	Subpart KK does not require opacity and visible emissions observations.
\$63.10(d)(4)	Yes	
\$63.10(d)(5)	No	
\$63.10(e)	Yes	Provisions for COMS are not applicable.
\$63.10(f)	Yes	
\$63.11	No	Subpart KK specifies the use of solvent recovery devices or oxidizers.
\$63.12	Yes	
\$63.13	Yes	
\$63.14	Yes	
\$63.15	Yes	

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b. 40 CFR 63 Subpart A and JJJJ - National Emission Standards for Hazardous Air Pollutants for Major Sources: Paper and Other Web Coating

Pursuant to 40 CFR 63 Subpart A and JJJJ, the Permittee shall comply with the following applicable General Provisions as indicated:

Table 2 to Subpart JJJJ of Part 63 - Applicability of 40 CFR Part 63 General Provisions to Subpart JJJJ

General provisions reference	Applicable to subpart JJJJ	Explanation
\$63.1(a)(1)-(4)	Yes	
\$63.1(a)(5)	No	Reserved
\$63.1(a)(6)-(8)	Yes	
\$63.1(a)(9)	No	Reserved
\$63.1(a)(10)-(14)	Yes	
\$63.1(b)(1)	No	Subpart JJJJ specifies applicability.
\$63.1(b)(2)-(3)	Yes	
\$63.1(c)(1)	Yes	
\$63.1(c)(2)	No	Area sources are not subject to emission standards of subpart JJJJ.
\$63.1(c)(3)	No	Reserved
\$63.1(c)(4)	Yes	
\$63.1(c)(5)	Yes	
\$63.1(d)	No	Reserved
\$63.1(e)	Yes	
\$63.1(e)(4)	No	
\$63.2	Yes	Additional definitions in subpart JJJJ.
\$63.3(a)-(c)	Yes	
\$63.4(a)(1)-(3)	Yes	
\$63.4(a)(4)	No	Reserved.
\$63.4(a)(5)	Yes	
\$63.4(b)-(c)	Yes	
\$63.5(a)(1)-(2)	Yes	
\$63.5(b)(1)	Yes	
\$63.5(b)(2)	No	Reserved
\$63.5(b)(3)-(6)	Yes	
\$63.5(c)	No	Reserved
\$63.5(d)	Yes	
\$63.5(e)	Yes	
\$63.5(f)	Yes	
\$63.6(a)	Yes	Applies only when capture and control system is used to comply with the standard.

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7.4 - 40 CFR Subpart A Requirements (NESHAP)

General provisions reference	Applicable to subpart JJJJ	Explanation
\$63.6(b)(1)-(5)	No	
\$63.6(b)(6)	No	Reserved
\$63.6(b)(7)	Yes	
\$63.6(c)(1)-(2)	Yes	
\$63.6(c)(3)-(4)	No	Reserved
\$63.6(c)(5)	Yes	
\$63.6(d)	No	Reserved
\$63.6(e)	Yes	Provisions pertaining to SSMP, and CMS do not apply unless an add-on control system is used to comply with the emission limitations.
\$63.6(f)	Yes	
\$63.6(g)	Yes	
\$63.6(h)	No	Subpart JJJJ does not require continuous opacity monitoring systems (COMS).
\$63.6(i)(1)-(14)	Yes	
\$63.6(i)(15)	No	Reserved
\$63.6(i)(16)	Yes	
\$63.6(j)	Yes	
\$63.7	Yes	
\$63.8(a)(1)-(2)	Yes	
\$63.8(a)(3)	No	Reserved
\$63.8(a)(4)	No	
\$63.8(b)	Yes	
\$63.8(c)(1)-(3)	Yes	\$63.8(c)(1)(i) & (ii) only apply if you use capture and control systems and are required to have a start-up, shutdown, and malfunction plan.
\$63.8(c)(4)	Yes	
\$63.8(c)(5)	No	Subpart JJJJ does not require COMS.
\$63.8(c)(6)-(c)(8)	Yes	Provisions for COMS are not applicable.
\$63.8(d)-(f)	Yes	\$63.8(f)(6) only applies if you use CEMS.
\$63.8(g)	Yes	Only applies if you use CEMS.
\$63.9(a)	Yes	
\$63.9(b)(1)	Yes	
\$63.9(b)(2)	Yes	Except \$63.3400(b)(1) requires submittal of initial notification for existing affected sources no later than 1 year before compliance date.
\$63.9(b)(3)-(5)	Yes	
\$63.9(c)-(e)	Yes	
\$63.9(f)	No	Subpart JJJJ does not require opacity and visible emissions observations.
\$63.9(g)	Yes	Provisions for COMS are not applicable.

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7.4 - 40 CFR Subpart A Requirements (NESHAP)

General provisions reference	Applicable to subpart JJJJ	Explanation
\$63.9(h)(1)-(3)	Yes	
\$63.9(h)(4)	No	Reserved
\$63.9(h)(5)-(6)	Yes	
\$63.9(i)	Yes	
\$63.9(j)	Yes	
\$63.10(a)	Yes	
\$63.10(b)(1)-(3)	Yes	\$63.10(b)(2)(i) through (v) only apply if you use a capture and control system.
\$63.10(c)(1)	Yes	
\$63.10(c)(2)-(4)	No	Reserved
\$63.10(c)(5)-(8)	Yes	
\$63.10(c)(9)	No	Reserved
\$63.10(c)(10)-(15)	Yes	
\$63.10(d)(1)-(2)	Yes	
\$63.10(d)(3)	No	Subpart JJJJ does not require opacity and visible emissions observations.
\$63.10(d)(4)-(5)	Yes.	
\$63.10(e)(1)-(2)	Yes	Provisions for COMS are not applicable.
\$63.10(e)(3)-(4)	No	
\$63.10(f)	Yes	
\$63.11	No	
\$63.12	Yes	
\$63.13	Yes	
\$63.14	Yes	Subpart JJJJ includes provisions for alternative ASME test methods that are incorporated by reference.
\$63.15	Yes	

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Table 1 to Subpart JJJJ of Part 63 – Operating Limits if Using Add-On Control Devices and Capture System

If you are required to comply with operating limits by §63.3321, you must comply with the applicable operating limits in the following table:

For the following device:	You must meet the following operating limit:	And you must demonstrate continuous compliance with operating limits by:
1. Thermal oxidizer	a. The average combustion temperature in any 3-hour period must not fall below the combustion temperature limit established according to §63.3360(e)(3)(i)	i. Collecting the combustion temperature data according to §63.3350(e)(9); ii. Reducing the data to 3-hour block averages; and iii. Maintain the 3-hour average combustion temperature at or above the temperature limit.
2. Catalytic oxidizer	a. The average temperature at the inlet to the catalyst bed in any 3-hour period must not fall below the combustion temperature limit established according to §63.3360(e)(3)(ii)	i. Collecting the catalyst bed inlet temperature data according to §63.3350(e)(9); ii. Reducing the data to 3-hour block averages; and iii. Maintain the 3-hour average catalyst bed inlet temperature at or above the temperature limit.
	b. The temperature rise across the catalyst bed must not fall below the limit established according to §63.3360(e)(3)(ii)	i. Collecting the catalyst bed inlet and outlet temperature data according to §63.3350(e)(9); ii. Reducing the data to 3-hour block averages; and iii. Maintain the 3-hour average temperature rise across the catalyst bed at or above the limit.
3. Emission capture system	Submit monitoring plan to the Administrator that identifies operating parameters to be monitored according to §63.3350(f)	Conduct monitoring according to the plan (§63.3350(f)(3)).

5. Compliance Assurance Monitoring (CAM) Requirements
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a. CAM Provisionsi. Proper Maintenance

Pursuant to 40 CFR 64.7(b), at all times, the source shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

ii. Continued Operation

Pursuant to 40 CFR 64.7(c), except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the source shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit (PSEU) is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of 40 CFR Part 64, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The source shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

iii. Response to Excursions or Exceedances

A. Pursuant to 40 CFR 64.7(d)(1), upon detecting an excursion or exceedance, the source shall restore operation of the PSEU (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

B. Pursuant to 40 CFR 64.7(d)(2), determination of whether the source has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device.

b. Monitoring - Monitoring

Pursuant to 40 CFR 64.7(a), the source shall comply with the monitoring requirements of the CAM Plans as described in 7.5(e) below, pursuant to 40 CFR Part 64 as submitted in the source's CAM plan application.

c. Monitoring - Recordkeeping

Pursuant to 40 CFR 64.9(b)(1), the source shall maintain records of the monitoring data, monitor performance data, corrective actions taken, monitoring equipment maintenance, and other supporting information related to the monitoring requirements established for CAM.

d. Monitoring - Reporting

Pursuant to Sections 39.5(7)(b) and (f) of the Act, the source shall submit the following reporting requirements:

i. Semiannual Reporting

As part of the required Semiannual Monitoring Reports, the source shall submit a CAM report including the following at a minimum:

- A. Summary information on the number, duration, and cause of excursions or exceedances, and the corrective actions taken pursuant to 40 CFR 64.6(c)(3) and 64.9(a)(2)(i).
- B. Summary information on the number, duration, and cause for monitoring equipment downtime incidents, other than downtime associated with calibration checks pursuant to 40 CFR 64.6(c)(3) and 64.9(a)(2)(ii).

e. CAM Plans

The following tables contain the CAM Plans in this CAAPP permit:

Table	Emission Unit Section	PSEU Designation	Pollutant
7.5.1	4.1	Laminators and Flexographic Presses with Oxidizers	VOM

Table 7.5.1 - CAM Plan

Emission Unit Section:	4.1
PSEU Designation:	Laminators and Flexographic Presses with Thermal Oxidizers
Pollutant:	VOM
Indicators:	#1) Thermal Oxidizer Combustion Chamber Temperature
General Criteria	
The Monitoring Approach Used to Measure the Indicators:	Continuously monitor and record combustion chamber temperature of each thermal oxidizer.
The Indicator Range Which Provides a Reasonable Assurance of Compliance:	Minimum temperature of 1400°F. Temperature monitors are accurate to + 1% or 1 degree C.
Quality Improvement Plan (QIP) Threshold Levels:	N/A
Performance Criteria	
The Specifications for Obtaining Representative Data:	Locations of the temperature monitors are in the combustion zones of each oxidizer.
Verification Procedures to Confirm the Operational Status of the Monitoring:	Temperature monitors are alarmed to indicate readings outside of specifications.
Quality Assurance and Quality Control (QA/QC) Practices that Ensure the Validity of the Data:	Temperature monitors are maintained in accordance with manufacturer's specifications.
The Monitoring Frequency:	Continuous
The Data Collection Procedures That Will Be Used:	Electronic record.
The Data Averaging Period For Determining Whether an Excursion or Exceedance Has Occurred:	One hour 1 st

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Emission Unit Section:	4.1
PSEU Designation:	Laminators and Flexographic Presses with Concentrator/Oxidizer
Pollutant:	VOM
Indicators:	#1) Catalytic Oxidizer Bed Inlet Temperature Monitor, Concentrator/Oxidizer Exhaust VOM Concentration
General Criteria	
The Monitoring Approach Used to Measure the Indicators:	Continuously monitor Catalytic Oxidizer Bed Inlet Temperature and Concentrator/Oxidizer Exhaust VOM Concentration
The Indicator Range Which Provides a Reasonable Assurance of Compliance:	Inlet temperature maintained at or above: 700 degree F
Quality Improvement Plan (QIP) Threshold Levels:	N/A
Performance Criteria	
The Specifications for Obtaining Representative Data:	Catalyst temperature is measured in the exhaust stream as close as possible to the catalyst bed. VOM concentration is measured in the Concentrator/Oxidizer exhaust.
Verification Procedures to Confirm the Operational Status of the Monitoring:	Verification was made with emissions testing when the operation of the unit meets manufacture's specifications.
Quality Assurance and Quality Control (QA/QC) Practices that Ensure the Validity of the Data:	All monitors are maintained in accordance with manufacturer's specifications.
The Monitoring Frequency:	Continuous.
The Data Collection Procedures That Will Be Used:	Electronic record.
The Data Averaging Period For Determining Whether an Excursion or Exceedance Has Occurred:	One hour.

Section 8 - State Only Requirements

1. Permitted Emissions for Fees

The annual emissions from the source for purposes of "Duties to Pay Fees" of Condition 2.3(e), not considering insignificant activities as addressed by Section 6, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. The Permittee shall maintain records with supporting calculations of how the annual emissions for fee purposes were calculated. This Condition is set for the purpose of establishing fees and is not federally enforceable. See Section 39.5(18) of the Act.

<i>Pollutant</i>		<i>Tons/Year</i>
Volatile Organic Material	(VOM)	161.42
Sulfur Dioxide	(SO ₂)	0.12
Particulate Matter	(PM)	1.54
Nitrogen Oxides	(NO _x)	15.95
HAP, not included in VOM or PM	(HAP)	----
Total		179.03

Attachment 1 - List of Emission Units at This Source

<i>Section</i>	<i>Emission Units</i>	<i>Description</i>
4.1	Laminator No. 1	Laminators are utilized to laminate plastic film to form flexible packaging products with dryer and controlled by oxidizers and permanent total enclosure.
4.1	Laminator No. 2	Laminators are utilized to laminate plastic film to form flexible packaging products with dryer and controlled by oxidizers and permanent total enclosure.
4.1	Laminator No. 4	Laminators are utilized to laminate plastic film to form flexible packaging products with dryer and controlled by oxidizers and permanent total enclosure.
4.1	Flexographic Press No. 9	Flexographic presses are used to print on plastic films and paper substrates and controlled by oxidizers and permanent total enclosure.
4.1	Flexographic Press No. 10	Flexographic presses are used to print on plastic films and paper substrates and controlled by oxidizers and permanent total enclosure.
4.1	Flexographic Press No. 11	Flexographic presses are used to print on plastic films and paper substrates and controlled by oxidizers and permanent total enclosure.
4.1	Flexographic Press No. 12	Flexographic presses are used to print on plastic films and paper substrates and controlled by oxidizers and permanent total enclosure.
4.2	Fixed Roof Storage Tank	4000 gallon underground storage tank for the bulk storage of VOM material.

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Attachment 2 - Acronyms and Abbreviations

acfm	Actual cubic feet per minute
ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment trading unit
BACT	Best Available Control Technology
BAT	Best Available Technology
BTU	British Thermal Units
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAIR	Clean Air Interstate Rule
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CISWI	Commercial Industrial Solid Waste Incinerator
CO	Carbon monoxide
CO ₂	Carbon dioxide
COMS	Continuous Opacity Monitoring System
CPMS	Continuous Parameter Monitoring System
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
EAF	Electric arc furnace
ERMS	Emissions Reduction Market System
°F	Degrees Fahrenheit
GHG	Green house gas
gr	Grains
HAP	Hazardous air pollutant
Hg	Mercury
HMIWI	Hospital medical infectious waste incinerator
HP	Horsepower
hr	Hour
H ₂ S	Hydrogen sulfide
I.D. No.	Identification number of source, assigned by IEPA
IAC	Illinois Administrative Code
ILCS	Illinois Compiled Statutes
IEPA	Illinois Environmental Protection Agency
KW	Kilowatts
LAER	Lowest Achievable Emission Rate
lb	Pound

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m	Meter
MACT	Maximum Achievable Control Technology
mm	Million
mon	Month
MSDS	Material Safety Data Sheet
MSSCAM	Major Stationary Sources Construction and Modification (Non-attainment New Source Review)
MW	Megawatts
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen oxides
NSPS	New Source Performance Standards
NSR	New Source Review
PM	Particulate matter
PM ₁₀	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
PM _{2.5}	Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 microns as measured by applicable test or monitoring methods
ppm	Parts per million
ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration
PSEU	Pollutant-Specific Emission Unit
psia	Pounds per square inch absolute
PTE	Potential to emit
RACT	Reasonable Available Control Technology
RMP	Risk Management Plan
scf	Standard cubic feet
SCR	Selective catalytic reduction
SIP	State Implementation Plan
SO ₂	Sulfur dioxide
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile organic material

Attachment 3 - Contact and Reporting Addresses

<p>IEPA Compliance Section</p> <p>IEPA Stack Test Specialist</p> <p>IEPA Air Quality Planning Section</p> <p>IEPA Air Regional Field Operations Regional Office #1</p> <p>IEPA Permit Section</p>	<p>Illinois EPA, Bureau of Air Compliance & Enforcement Section (MC 40) 1021 North Grand Avenue East P.O. Box 19276 Springfield, Illinois 62794-9276</p> <p>Phone No.: 217/782-2113</p>
	<p>Illinois EPA, Bureau of Air Compliance Section Source Monitoring - Third Floor 9511 Harrison Street Des Plaines, Illinois 60016</p> <p>Phone No.: 847/294-4000</p>
	<p>Illinois EPA, Bureau of Air Air Quality Planning Section (MC 39) 1021 North Grand Avenue East P.O. Box 19276 Springfield, Illinois 62794-9276</p> <p>Phone No.: 217/782-2113</p>
	<p>Illinois EPA, Bureau of Air Regional Office #1 9511 Harrison Street Des Plaines, Illinois 60016</p> <p>Phone No.: 847/294-4000</p>
	<p>Illinois EPA, Bureau of Air Permit Section (MC 11) 1021 North Grand Avenue East P.O. Box 19506 Springfield, Illinois 62794-9506</p> <p>Phone No.: 217/785-1705</p>
<p>USEPA Region 5 - Air Branch</p>	<p>USEPA (AR - 17J) Air and Radiation Division 77 West Jackson Boulevard Chicago, Illinois 60604</p> <p>Phone No.: 312/353-2000</p>

Attachment 4 - Example Certification by a Responsible Official

SIGNATURE BLOCK	
NOTE: THIS CERTIFICATION MUST BE SIGNED BY A RESPONSIBLE OFFICIAL. APPLICATIONS WITHOUT A SIGNED CERTIFICATION WILL BE DEEMED AS INCOMPLETE.	
I CERTIFY UNDER PENALTY OF LAW THAT, BASED ON INFORMATION AND BELIEF FORMED AFTER REASONABLE INQUIRY, THE STATEMENTS AND INFORMATION CONTAINED IN THIS APPLICATION ARE TRUE, ACCURATE AND COMPLETE. ANY PERSON WHO KNOWINGLY MAKES A FALSE, FICTITIOUS, OR FRAUDULENT MATERIAL STATEMENT, ORALLY OR IN WRITING, TO THE ILLINOIS EPA COMMITS A CLASS 4 FELONY. A SECOND OR SUBSEQUENT OFFENSE AFTER CONVICTION IS A CLASS 3 FELONY. (415 ILCS 5/44(H))	
AUTHORIZED SIGNATURE:	
BY: _____	_____
AUTHORIZED SIGNATURE	TITLE OF SIGNATORY
_____	_____/_____/_____
TYPED OR PRINTED NAME OF SIGNATORY	DATE

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